

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

LCC-MZT TEAM IV,)	
)	
Plaintiff,)	
)	
v.)	No. 16-1406C
)	(Senior Judge Horn)
THE UNITED STATES,)	
)	
Defendant.)	

JOINT STATUS REPORT

Pursuant to the Court's October 24, 2018, Order, the parties respectfully submit this Joint Status Report regarding the status of Alternative Dispute Resolution (ADR) and the status of ongoing discovery. Dkt. No. 53.

Alternative Dispute Resolution

The parties communicated with Judge Hodges's chambers to schedule ADR. Although ADR was originally scheduled for December 14, 2018 in San Diego, California, due to a change in Judge Hodges's schedule, the ADR will be rescheduled for January. The parties are discussing their respective availability for a rescheduled ADR and hope to schedule it within the next several weeks.

Discovery

The parties completed expert depositions on October 31, 2018 and November 1, 2018. Following depositions, both plaintiff and defendant requested documents upon which the experts relied to form their opinions, which were not produced prior to deposition, and the parties are working to exchange those documents.

Defendant completed the continued deposition of Jim Mortensen on October 23, 2018. Defendant is still considering whether to depose Scott Wakefield of PSW Electric, Inc., who was identified as a witness in plaintiff's supplemental disclosures on October 10, 2018. In addition, defendant is considering whether to seek further discovery regarding the plaintiff's reliance upon the P-971 contract as part of its bid, which plaintiff first raised in its Expert Report served on

July 30, 2018 and for which defendant is currently awaiting documents. It is Plaintiff's understanding that all documents relating to P-971 utilized by the expert in his analysis have already been produced. However, the parties will work together to resolve any outstanding issues relating to the experts.

Respectfully submitted,

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Dated: November 9, 2018

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of November, 2018, a copy of the foregoing “JOINT STATUS REPORT” was filed electronically. I understand that notice of this filing will be sent to all parties by operation of the Court’s electronic filing system. Parties may access this filing through the Court’s system.

s/Erin K. Murdock-Park